THE HONORABLE BARBARA J. ROTHSTEIN 1 2 3 4 5 6 7 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 PARLER, LLC, Case No. 21-cv-00270-BJR 10 Plaintiff, 11 PLAINTIFF PARLER LLC'S MOTION TO SEAL PORTION OF PARLER'S 12 RESPONSE TO SUPPLEMENTAL VS. STATEMENT OPPOSING REMAND 13 AMAZON WEB SERVICES, INC., and AMAZON.COM, INC., 14 Defendants. 15 16 17 18 19 20 21 22 23 24 25

PLAINTIFF PARLER LLC'S MOTION TO SEAL PORTION OF PARLER'S RESPONSE TO SUPPLEMENTAL STATEMENT OPPOSING REMAND

(Case No. 2:21-cv-00270-BJR)

LAW OFFICES

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On March 15, 2021, this Court granted the motion of Plaintiff Parler LLC to seal portions of its corporate disclosure statement. Dkt. 16. On July 1, 2021, the Court ordered Plaintiff to produce certain documents, providing that the "documents shall be designated Attorneys' Eyes Only." Dkt. 49, at 3. Defendants filed a motion to seal (Dkt. 59) in connection with the Supplemental Statement Opposing Remand they filed on July 22, 2021, because it contained confidential information or would reveal aspects of information maintained under seal pursuant to the March 15 order and designated as "Attorneys' Eyes Only" pursuant to the July 1 order.

In addition, Parler's Response to Defendants' Supplemental Statement Opposing Remand contains information that would reveal the same confidential information. The confidential information which Parler requests to remain sealed relates to Parler's members and confidential information concerning a trust. Counsel for Parler has met and conferred with Defendants' counsel concerning this motion and they have indicated that they have no objection. The information that Parler requests to remain under seal is private information that is only relevant to the issue of determining citizenship for diversity purposes, and is not material to the merits of the case. Accordingly, Plaintiff respectfully asks the Court to maintain the unredacted version of Parler's Response to the Supplemental Statement Opposing Remand under seal.

DATED this 29th day of July, 2021.

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PLAINTIFF PARLER LLC'S MOTION TO SEAL PORTION OF PARLER'S RESPONSE TO SUPPLEMENTAL STATEMENT OPPOSING **REMAND** (Case No. 2:21-cv-00270-BJR) - 1

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DAVID J. GROESBECK, P.S. 1 David J. Groesbeck, WSBA # 24749 1333 E. Johns Prairie Rd. 2 Shelton, WA 98584 Phone: (509) 747-2800 3 Email: david@groesbecklaw.com 4 SCHAERR |JAFFE LLP 5 Gene C. Schaerr (pro hac vice to be submitted) 6 H. Christopher Bartolomucci (pro hac vice to be submitted) 7 1717 K Street NW, Suite 900 Washington, DC 20006 8 Counsel for Plaintiff Parler LLC 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 PLAINTIFF PARLER LLC'S MOTION TO SEAL LAW OFFICES

PLAINTIFF PARLER LLC'S MOTION TO SEAL PORTION OF PARLER'S RESPONSE TO SUPPLEMENTAL STATEMENT OPPOSING REMAND

(Case No. 2:21-cv-00270-BJR) - 2

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